

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MIKE KREIDLER, Insurance Commissioner for
the State of Washington and as Receiver for
Cascade National Insurance Company, in
Liquidation,

Plaintiff,

v.

DANNY L. PIXLER and ROXANN PIXLER,
individually and their marital community;
ANTHONY HUFF and SHERI HUFF,
individually and their marital community;
AMERICAN STAFF RESOURCES OF
CALIFORNIA, INC., a Delaware corporation;
CERTIFIED SERVICES, INC., a Nevada
corporation; MIDWEST MERGER
MANAGEMENT, LLC, a Kentucky Limited
Liability Company; and JOHN DOES 1 – 10,

Defendants.

NO. C06-697 RSL

[PROPOSED] ORDER ESTABLISHING A
DISCOVERY PLAN

THIS MATTER having come on before the Court on Plaintiff's Motion for Order
Establishing Discovery Plan, and the Court having considered the records and files herein and

[PROPOSED] ORDER ESTABLISHING A DISCOVERY PLAN

1 the pleadings of the parties submitted on the matter, and having determined that a discovery
2 plan should be entered in this case, and being otherwise duly advised in the premises, now
3 therefore,

4 IT IS HEREBY ORDERED AS FOLLOWS:

5 1. Plaintiff's Motion is granted.

6 2. Prior to commencing depositions, the parties shall complete document
7 production and responses to the written discovery which has been served to date in this action.
8 The parties shall timely respond and answer, and shall confer within a reasonable period of
9 time as to any disagreements or disputes, which disputes and conferences shall be completed
10 no later than the middle of August, 2007. If the parties cannot reach agreement, either party
11 may promptly file a motion.
12

13 3. Depositions shall be scheduled by mutual, good faith cooperation and
14 agreement. They shall commence no earlier than the end of August, provided the documents
15 have been produced as agreed or as ordered. Depositions of the initially listed deponents (24)
16 shall be completed by the end of November, 2007.
17

18 4. No deposition of Insurance Commissioner Mike Kreidler shall be held until
19 there is either an agreed order or an order of the Court.

20 5. Following completion of the initial wave of the 24 depositions, the parties may
21 each seek additional written discovery or document production from other parties or third
22 parties; or may seek additional depositions. If the parties disagree on any matters, after
23 conferring, either party may bring the issue before the Court.
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